

# EXHIBIT B

MR. DARIUS MARZEC  
MARZEC LAW FIRM, P.C.  
776A MANHATTAN AVENUE, STE 104  
BROOKLYN, NY 11222

SEPTEMBER 21, 2018

**PLEASE PAY \$27,005.31**

**THANK YOU**

PLEASE MAIL PAYMENT TO:

ANDRZEJ BAR  
59 FURMAN AVENUE  
SAYREVILLE, NJ 08872

MR. DARIUS MARZEC  
MARZEC LAW FIRM, P.C.  
776A MANHATTAN AVENUE, STE 104  
BROOKLYN, NY 11222

CLIENT #3628

BAR ANDRZEJ UNPAID W

**PLEASE DETACH AND RETURN WITH YOUR PAYMENT OF \$27,005.31**

CLIENT #3628

BAR ANDRZEJ UNPAID W

**NJ - UNPAID WAGES**

PROFESSIONAL SERVICES SINCE THE LAST STATEMENT			HOURS	FEES
03/02/16	MJS	REVIEW FILE AND DRAFT COMPLAINT	1.30	\$325.00
04/14/16	MJS	CONFERENCE IN OFFICE	.30	\$75.00
04/15/16	MJS	DRAFT COMPLAINT	1.50	\$375.00
04/20/16	MJS	DRAFT COMPLAINT, PREPARE SUMMONSES TO ALL DEFENDANTS, PREPARE FOR FILING AND SERVICE.	4.00	\$1,000.00
04/20/16	MJS	FILE ACTION WITH COURT	.50	\$125.00
04/21/16	MJS	PREPARE SUMMONSES	.50	\$125.00
04/21/16	MJS	SEARCH PACER FOR SUMMONSES.	.20	\$50.00
04/25/16	BAB	MAKING COPIES OF 8 SUMMONS AND PREPARING FOR SERVING	1.00	\$150.00
05/06/16	MJS	NOTARIZE AND FILE AFFIDAVITS OF SERVICE	.50	\$125.00
05/17/16	MJS	CALCULATE 21 DAYS AFTER SERVICE CALENDAR DATES	.20	\$50.00
05/24/16	MJS	DRAFT REQUEST FOR DEFAULT	1.00	\$250.00
05/26/16	MJS	DRAFT MOTION FOR DEFAULT	.50	\$125.00
05/27/16	MJS	FINALIZE REQUEST FOR DEFAULT. DISCUSSION AND REVIEW IN OFFICE. FILE WITH COURT.	1.20	\$300.00
06/03/16	BAB	FINALIZING CLIENT CERTIFICATION	1.00	\$250.00
06/03/16	BAB	DRAFTING CERTIFICATION OF CLIENT IN SUPPORT OF MOTION	5.50	\$1,375.00
06/13/16	BAB	PREPARING AND DRAFTING MEMORANDUM OF LAW FOR DEFAULT JUDGMENT	3.00	\$450.00
06/14/16	BAB	CONTINUING TO DRAFT MEMORANDUM OF LAW IN SUPPORT OF MOTION FOR DEFAULT JUDGMENT	3.00	\$450.00
06/15/16	BAB	DRAFTING MEMORANDUM OF LAW IN SUPPORT OF MOTION FOR DEFAULT JUDGMENT	2.00	\$300.00
06/24/16	MJS	DRAFT MOTION FOR DEFAULT JUDGMENT	1.00	\$250.00
06/27/16	MJS	DRAFT MOTION FOR DEFAULT. RESEARCH	4.00	\$1,000.00
06/28/16	MJS	DRAFT MOTION FOR DEFAULT JUDGMENT	1.50	\$375.00
06/30/16	MJS	DRAFT MOTION FOR DEFAULT. RESEARCH CASES. DISCUSSION IN OFFICE.	1.50	\$375.00
07/01/16	MJS	DRAFT MEMO AND PREPARE FOR REVIEW	1.50	\$375.00
08/12/16	BAB	CONTACTING JUDGE'S CHAMBERS REGARDING MOTION	.20	\$30.00
08/19/16	MJS	REPRINT MOTION, DISCUSSION IN OFFICE. DRAFT AND FILE LETTER TO JUDGE.	.70	\$175.00
08/22/16	MJS	RESEARCH FOR AND DRAFT MOTION	4.50	\$1,125.00

**NJ - UNPAID WAGES (CONTINUED)**

08/23/16	MJS	DRAFT MOTION. DISCUSSION IN OFFICE.	4.50	\$1,125.00
08/23/16	BAB	VERIFYING MATH FOR CALCULATION OF UNPAID WAGES	.50	\$75.00
08/23/16	BAB	ASSISTING IN LOCATING INVOICE FOR SERVICE OF PROCESS	.20	\$30.00
08/24/16	MJS	PREPARE MOTION FOR REVIEW. REVIEW RULES FOR MOTIONS IN COURT.	.80	\$200.00
08/25/16	MJS	FILE MOTION. PREPARE MAILINGS.	1.00	\$250.00
09/12/16	MJS	QUERY PACER FOR STATUS OF CASE.	.20	\$50.00
10/13/16	MJS	FIND RULES FOR JUDGES TO DETERMINE IF COURTESY COPIES REQUIRED.	.40	\$100.00
10/14/16	DM	CONFERENCE WITH ADVERSARY, CALL TO CLIENT	.30	\$90.00
12/16/16	DM	REVIEW EMAILS AND CONTACT MEDIATION AND COUNSEL	.30	\$90.00
12/27/16	MJS	DRAFT MEDIATION STATEMENT	2.00	\$500.00
01/05/17	MJS	DRAFT MEDIATION STATEMENT AND CALCULATE NUMBERS	2.50	\$625.00
01/09/17	DM	CONFERENCE WITH MEDIATOR-- PHONE	.40	\$120.00
01/20/17	MJS	REVIEWING LOCAL RULES AND COURT'S JOINT DISCOVERY ORDER FORM	.50	\$125.00
01/24/17	MJS	DRAFTING JOINT DISCOVERY ORDER	.50	\$125.00
01/27/17	MJS	REVIEW SETTLEMENT AGREEMENT AND FORMAT PROPERLY	.40	\$100.00
04/25/17	MJS	REVIEW LOCAL RULES REGARDING 60-DAY DISMISSAL ORDER. DRAFT MOTION TO VACATE.	1.50	\$375.00
04/26/17	MJS	DRAFT MOTION TO VACATE ORDER. RESEARCH ON MOTION AND MOTION FOR SANCTIONS.	3.00	\$750.00
04/27/17	MJS	DISCUSSION IN OFFICE REGARDING CONFIDENTIALITY OF SETTLEMENT. MODIFY MOTION TO CONFORM WITH CONFIDENTIALITY. RESEARCH RULES ON SEALING. DRAFT MOTION TO SEAL. FILE MOTION TO VACATE.	2.00	\$500.00
04/28/17	MJS	CONTACT ECF HELP DESK TO ENSURE DOCUMENT FILED PROPERLY UNDER SEAL. FINALIZE AND SERVE COPIES OF MOTION. FILE SEALED DOCUMENT. DRAFT MOTION TO SEAL.	3.00	\$750.00
05/01/17	MJS	DRAFT, FILE AND SERVE AMENDED NOTICE OF MOTION FOLLOWING DEFENDANTS' EXECUTION OF AGREEMENT.	3.00	\$750.00
05/02/17	MJS	DRAFT AND PRINT MOTION TO SEAL	1.00	\$250.00
05/11/17	MJS	REVIEW REQUIREMENT IN AGREEMENT. DRAFT AND SEND NOTICE OF DEFAULT.	.50	\$125.00
05/25/17	MJS	REVIEW ORDER FROM COURT. DISCUSSION IN OFFICE. PREPARE DOCUMENTS FOR MOTION.	.50	\$125.00
05/26/17	MJS	DRAFT MOTION, FILE AND SEND	4.00	\$1,000.00
05/31/17	MJS	REVIEW E-MAILS FOR E-MAIL WITH NOTICE THAT OPP. COUNSEL CLAIMS HE DIDN'T RECEIVE.	.20	\$50.00
06/06/17	MJS	CHECK DOCKET	.20	\$50.00
06/06/17	MJS	CHECK DOCKET	.20	\$50.00
06/07/17	MJS	DRAFT AND FILE LETTER TO JUDGE.	.30	\$75.00
08/10/17	DM	REVIEW CORRESPONDENCE FROM COUNSEL RESPOND TO EMAIL PHONE CONFERENCE WITH PAUL RUTIGLIANO	.40	\$120.00
11/21/17	MJS	DRAFT LETTER TO JUDGE	.20	\$50.00
12/13/17	MJS	REVISE LETTER TO JUDGE	.20	\$50.00
12/28/17	MJS	PRINT ORDER. DISCUSSION IN OFFICE.	.50	\$125.00
12/28/17	RJ	SCAN AND SEND OUT LETTER TO COURT REQUESTING EXEMPLIFIED COPIES OF JUDGMENT	.20	\$55.00
12/28/17	RJ	DRAFT LETTER TO PARTIES ADVISING OF JUDGMENT ENTERED	.30	\$82.50
12/28/17	RJ	CALL COURTHOUSE ON REQUESTING EXEMPLIFIED COPIES OF JUDGMENT	.20	\$55.00
12/28/17	RJ	DRAFT POST JUDGMENT DISCOVERY DEMANDS; REVIEW FILES AS NECESSARY, DRAFT REQUEST FOR PRODUCTION OF DOCUMENT	1.50	\$412.50
12/28/17	RJ	DRAFT LETTER TO COURT REQUESTING EXEMPLIFIED COPIES	.30	\$82.50

**NJ - UNPAID WAGES (CONTINUED)**

12/28/17	RJ	CALL COURT REGARDING OBTAINING EXEMPLIFIED COPIES OF JUDGMENT	.10	\$27.50
12/29/17	RJ	REVIEWING PROCEDURE FOR FILING MOTION FOR TRO AND FILING A WRIT OF EXECUTION WITH THE MARSHALS OFFICE	.80	\$220.00
12/29/17	RJ	DRAFT DISCOVERY DEMANDS; REQUEST FOR DOCUMENTS AND INTERROGATORIES	1.20	\$330.00
01/02/18	RJ	RESEARCHING PROCESS FOR OBTAINING TRO IN NEW JERSEY, FINDING TEMPLATE, AND DRAFT OSC	1.90	\$522.50
01/03/18	RJ	PHONE CALL WITH MARSHALLS OFFICE REGARDING WRIT OF EXECUTION IN NEW YORK	.20	\$55.00
01/03/18	RJ	RESEARCHING PROCESS OF FILING AND SERVING WRIT OF EXECUTION, FINDING TEMPLATES, DRAFTING WRIT OF EXECUTION ALONG WITH AFFIDAVIT, DRAFTING USM-285 FORM	1.00	\$275.00
01/03/18	RJ	DRAFTING WRIT OF EXECUTIONS AND ACCOMPANYING DOCUMENTS	2.70	\$742.50
01/04/18	RJ	RESEARCHING TEMPLATES AND FORMAT AND DRAFTING POST JUDGMENT NOTICE TO PRODUCE, INTERROGATORIES, AND NOTICE OF DEPOSITION, CONFERENCING WITH DM AS NECESSARY	1.90	\$522.50
01/05/18	RJ	DRAFTING DISCOVERY DEMANDS	2.00	\$550.00
01/11/18	RJ	RESEARCHING TEMPLATES FOR DISCOVERY DEMANDS, REVISING DISCOVERY DEMANDS	2.00	\$550.00
01/12/18	RJ	DRAFTING BAR DISCOVERY DEMANDS FOR CORPORATE DEFENDANT	.50	\$137.50
01/17/18	RJ	DRAFTING DISCOVERY DEMANDS	.50	\$137.50
01/18/18	RJ	DRAFTING DISCOVERY DEMANDS	2.00	\$550.00
01/29/18	RJ	RESEARCHING PROCESS FOR FILING FOREIGN JUDGMENT	.30	\$82.50
01/30/18	RJ	DRAFTING AFFIDAVIT OF FOREIGN JUDGMENT, AFFIDAVIT OF SERVICE, AND LETTER NOTICE TO JUDGMENT DEBTORS	1.20	\$330.00
02/06/18	RJ	REVISING AFFIDAVIT OF FOREIGN JUDGMENT, MAILING OUT AND DRAFTING COVER LETTER	.30	\$82.50
02/27/18	RJ	DRAFTING APPLICATION TO PURCHASE INDEX NUMBER, CALLING COURT REGARDING FILING OF FOREIGN JUDGMENT	.90	\$247.50
03/08/18	RJ	DRAFTING WRIT OF EXECUTION	.30	\$82.50
04/04/18	RJ	DRAFTING BLUEBACK, PREPARING DOCUMENTS FOR FILING OF FOREIGN JUDGMENT	.30	\$82.50
04/04/18	RJ	PREPARING DOCS FOR FILING OF FOREIGN JUDGMENT	.30	\$82.50
04/05/18	MJS	CLERK'S OFFICE TO FILE FOREIGN JUDGMENT.	.50	\$125.00
04/05/18	RJ	DRAFTING AND REVISING AFFIRMATION, AND E-FILING JUDGMENT	.40	\$110.00
04/10/18	RJ	CALLING COURT REGARDING FILING. DRAFTING NOTICE TO JUDGMENT DEBTOR	.20	\$55.00
04/11/18	RJ	CALLING E-COURTS HELP DESK RE JUDGMENT, REVISING AFFIRMATION AND REFILE	.30	\$82.50
04/12/18	RJ	DRAFTING NOTICE OF ENTRY, AFFIRMATION OF SERVICE, AND PREPARING MAILING	.40	\$110.00
04/13/18	RJ	DRAFTING COVER LETTER AND LITIGATION BACK FOR NOTICE OF ENTRY	.40	\$110.00
04/13/18	RJ	REVISING NOTICE OF ENTRY AND AFFIRMATION OF SERVICE AND COVER LETTER	.20	\$55.00
04/19/18	RJ	REVISING NOTICE OF ENTRY	.10	\$27.50
04/19/18	RJ	REVISING AND PREPARING DOCUMENTS FOR NOTICE OF ENTRY SERVICE AND FILING	.20	\$55.00
04/20/18	RJ	REVISING NOTICE OF ENTRY, AFFIRMATION OF SERVICE, COVER LETTER, AND LITIGATION BACK	.20	\$55.00
05/15/18	DM	CONFERENCE WITH ATTORNEY FOR REMAINING DEFENDANTS.	.30	\$90.00



**NJ - UNPAID WAGES (CONTINUED)**

05/21/18	MJS	DRAFT AND FILE CERTIFICATION OF SERVICE OF NOTICE LETTER TO PARTIES	.30	\$75.00
05/22/18	MJS	PREPARE FOR AND TELEPHONE CONFERENCE WITH COURT	.50	\$125.00
05/31/18	RJ	REVISING POST JUDGMENT DISCOVERY DEMANDS	.60	\$165.00
06/01/18	RJ	PREPARING POST-JUDGMENT DISCOVERY DEMANDS FOR MAILIN	.10	\$27.50
06/01/18	RJ	PREPARING CERTIFIED MAILING OF DISCOVERY DEMANDS AND SENDING IT OUT AT POST OFFICE	.50	\$137.50
06/01/18	MJS	PREPARE SERVICE OF ORDER TO SHOW CAUSE.	.50	\$125.00
07/23/18	MJS	REVIEW DOCKET	.20	\$50.00
07/24/18	MJS	DRAFT LETTER TO MAGISTRATE AND FILE	.40	\$100.00
08/21/18	MJS	RECEIVE CALL FROM COURT	.20	\$50.00
<b>TOTAL:</b>			106.70	\$26,432.50

**SUMMARY OF HOURS, RATES AND FEES**

DM	DARIUS MARZEC, ESQ.	1.70	\$300.00 / HOUR =	\$510.00
MJS	MJS	62.10	\$250.00 / HOUR =	\$15,525.00
BAB	BAB	9.90	\$150.00 / HOUR =	\$1,485.00
BAB	BAB	6.50	\$250.00 / HOUR =	\$1,625.00
RJ	RJ	26.50	\$275.00 / HOUR =	\$7,287.50

**COSTS ADVANCED SINCE THE LAST STATEMENT**

04/20/16	FILING FEE	<b>COSTS</b>
09/27/16	COURIER SERVICES - FIRST CLASS MAIL	\$400.00
04/28/17	COURIER SERVICES - FIRST CLASS MAIL	\$2.00
04/28/17	PHOTOCOPY CHARGES - 120 COPIES X .15	\$12.00
05/01/17	COURIER SERVICES - FIRST CLASS MAIL	\$18.00
05/01/17	PHOTOCOPY CHARGES - 120 COPIES X .15	\$12.00
05/01/17	PHOTOCOPY CHARGES - 120 COPIES X .15	\$18.00
05/02/17	PHOTOCOPY CHARGES - 35 COPIES X .15	\$5.25
05/26/17	PHOTOCOPY CHARGES - 270 COPIES X .15	\$40.50
05/26/17	COURIER SERVICES - FIRST CLASS MAIL	\$28.00
04/05/18	COST: FILING FEE OF FOREIGN JUDGMENT	\$0.00
04/23/18	COST: CERTIFIED MAIL OF NOTICE OF ENTRY WITH FOREIGN JUDGMENT	\$20.73
05/29/18	COURIER SERVICES - FIRST CLASS MAIL	\$3.00
06/01/18	CERTIFIED MAIL OF POST JUDGMENT DISCOVERY DEMANDS FOR JESSICA GENITON	\$7.33
<b>TOTAL:</b>		\$566.81

**STATEMENT SUMMARY**

BALANCE FROM THE LAST STATEMENT:	\$6.00
PLUS CHARGES LISTED ABOVE:	\$26,999.31
<b>PLEASE PAY THE TOTAL BALANCE DUE:</b>	<b>\$27,005.31</b>

MARZEC LAW FIRM, P.C. (212) 267-0200